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January 12, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)**

Dear Judge Furman:

We write regarding the draft of the written jury questionnaire at docket number 220 to respectfully propose that the Court add the following two questions:

1. Have you ever hired an attorney? If yes, in connection with what type of matter and was there anything positive or negative about the experience?
2. Mr. Avenatti was a practicing civil trial lawyer who sued individuals and large corporations. Would this affect your ability to be fair and impartial in this case and, if so, how?

Further, the defense wishes to inform the Court that only undersigned counsel will be present for the Court's introduction of the questionnaire to the venire, and that no one else will remain present while the prospective jurors complete the paperwork.

Respectfully Submitted,

/s/
Robert M. Baum
Tamara L. Giwa
Andrew J. Dalack
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti